HMRI

HUNTINGTON MEDICAL RESEARCH INSTITUTES

July 28, 2009

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Amendment of Parts 2 and 95 of the Commission's Rules to Provide Additional Spectrum for the Medical Device Radiocommunication Service in the 413-457 MHz Band (ET Dkt. No. 09-36; RM-11404)

Dear Ms. Dortch:

The Neural Engineering Program of Huntington Medical Research Institutes supports expeditious Commission action to encourage deployment of medical micro-power network ("MMN") devices in the 413-457 MHz band.

The Huntington Medical Research Institutes is an independent, nonprofit, public-benefit organization (501C3) dedicated to improving health and prolonging life by enhancing knowledge of life processes and disease, and by developing technology to diagnose and treat diseases. HMRI has a 60-year history improving medical care, by identifying clinical problems, conducting research and development in the laboratory, and then moving these developments into clinical trials. The Neural Engineering Program is currently the largest program of HMRI, with the highest level of funding from the National Institutes of Health. The NEP designs and develops implantable electrode systems for neural prosthetics and neural modulation. Its senior staff is recognized as amongst the foremost authorities on the effects of electrical stimulation on neural tissue, and for the past 35 years the program has been supported by grants and contracts from the National Institutes of Health.

We are aware that the Alfred Mann Foundation ("AMF") has been developing MMN devices that could be invaluable in the treatment of various neuromuscular injuries and conditions. We believe that MMN technology provides a unique wireless approach that is unlike any commercially available medical treatment option. This technology, if successfully implemented, will revolutionize the medical treatment and therapy for millions of people suffering from debilitating neuromuscular injuries and conditions and from other neurological conditions.

If there is even a small chance that this groundbreaking technology can deliver on a fraction of its promises, the Commission should dedicate the resources necessary to allow the technology to realize its full potential. We urge the Commission to allocate the full amount of spectrum requested by AMF for MMN use and to adopt service and technical rules permitting MMN operation.

Sincerely,

Douglas B McCreery, Ph.D
Director, Neural Engineering Program
Huntington Medical Research Institutes

NEURAL ENGINEERING PROGRAM
734 Fairmount Avenue, Pasadena, CA 91105-3104 • (626) 397-5850 • Fax (626) 397-5857